

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

PATSY WIDAKUSWARA, JESSICA  
JERREAT, KATHRYN NEEPER, JOHN  
DOES 1-4, REPORTERS SANS FRONTIÈRES,  
REPORTERS WITHOUT BORDERS, INC.,  
AMERICAN FEDERATION OF STATE,  
COUNTY AND MUNICIPAL EMPLOYEES  
(AFSCME), AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES (AFGE),  
AMERICAN FOREIGN SERVICE  
ASSOCIATION (AFSA), and THE  
NEWSGUILD-CWA,

*Plaintiffs,*

v.

KARI LAKE, in her official capacity as Senior  
Advisor to the Acting CEO of the United  
States Agency for Global Media; VICTOR  
MORALES, in his official capacity as acting  
Chief Executive Officer of the United States  
Agency for Global Media; and UNITED  
STATES AGENCY FOR GLOBAL MEDIA,

*Defendants.*

**Index No. 25 Civ. 2390 (JPO)**

**MOTION OF REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS AND  
COMMITTEE TO PROTECT JOURNALISTS FOR LEAVE TO FILE AMICI BRIEF**

Proposed amici curiae the Reporters Committee for Freedom of the Press and  
the Committee to Protect Journalists (together, “amici”) respectfully move this Court  
for leave to file the attached amici curiae brief in support of Plaintiff’s Motion for a  
Temporary Restraining Order and Preliminary Injunction. The proposed brief is

attached to this Motion.

“District courts have broad discretion to permit or deny the appearance of amici curiae in a given case.” *Micula v. Gov’t of Romania*, No. 15 Misc. 107, 2015 WL 4643180, at \*1 (S.D.N.Y. Aug. 5, 2015). Amicus briefs are appropriately accepted “when the amicus has unique information or perspective that can help the court beyond the help that the lawyers for the parties are able to provide.” *Auto. Club of N.Y., Inc. v. Port Auth. of N.Y. & N.J.*, No. 11 Civ. 6746 (RJH), 2011 WL 5865296, at \*2 (S.D.N.Y. Nov. 22, 2011) (internal quotation and citation omitted); *accord C&A Carbone, Inc. v. County of Rockland, N.Y.*, No. 08-cv-6459-ER, 2014 WL 1202699, at \*3 (S.D.N.Y. Mar. 24, 2014).

Such is the case here. Amicus the Reporters Committee for the Freedom of the Press is an unincorporated nonprofit association of reporters and editors dedicated to defending the First Amendment and newsgathering rights of the press. The Reporters Committee has appeared as amicus curiae in this Court, *see, e.g., Order, Uniformed Fire Officers Association v. DeBlasio*, No. 1:20-cv-05441 (S.D.N.Y. Aug. 17, 2020) (granting the Reporters Committee leave to file an amicus brief), and in other federal courts where the federal government takes action that inhibits newsgathering or chills the independence of the press, including in cases involving U.S. Agency for Global Media networks like Plaintiff, *see, e.g., Order, Turner v. U.S. Agency for Global Media*, No. 1:20-cv-02885 (D.D.C. Oct. 23, 2020) (granting the Reporters Committee and a coalition of media organizations leave to file in support of a motion for preliminary injunction

seeking to reverse actions that harmed independence of USAGM networks).

Amicus the Committee to Protect Journalists is an independent, nonprofit organization that was founded in 1981 to promote press freedom worldwide. It defends the right of journalists to report the news without fear of reprisal. CPJ is a global organization headquartered in New York City. CPJ's board of directors is composed of prominent journalists, media executives, and leaders from related professions.

The amici brief highlights for the Court the bedrock importance of editorial independence at Voice of America ("VOA"). Congress has required the networks to be afforded such independence, which is essential to maintaining the reputation and safety of VOA reporters domestically and abroad.

Amici are uniquely positioned to provide the Court with information and insight based on their experience advocating on behalf of reporters and media outlets. The proposed amici brief provides broader context on the centrality of editorial independence and freedom from interference by the President to VOA's ability to carry out its core journalistic functions.

Plaintiffs consent to the filing of the amici brief. Defendants take no position on amici's motion for leave to file.

Dated: March 28, 2025

Respectfully submitted,

/s/ Lin Weeks

Lin Weeks

*Counsel of Record for Amici Curiae*

Gabriel Rottman\*

Mara Gassmann\*

Grayson Clary\*

Renee M. Griffin\*

Ellen Goodrich\*

REPORTERS COMMITTEE FOR

FREEDOM OF THE PRESS

1156 15th Street NW, Suite 1020

Washington, DC 20005

Telephone: 202.795.9300

[lweeks@rcfp.org](mailto:lweeks@rcfp.org)

\*Of counsel

*Counsel for Amici Curiae*

**CERTIFICATE OF SERVICE**

I, Lin Weeks, do hereby certify that I have filed the foregoing Motion for Leave to File Brief of Amicus Curiae and Attached Proposed Brief of Amicus Curiae electronically with the Clerk of the Court for the United States District Court for the Southern District of New York using the ECF filing system on March 28, 2025, which will automatically send notices of such filing to all counsel of record.

/s/ Lin Weeks

Lin Weeks

*Counsel of Record for Amicus Curiae*

REPORTERS COMMITTEE FOR  
FREEDOM OF THE PRESS